

FILED

FEB 21 2024

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT _____

Clerk, U. S. District Court
Eastern District of Tennessee
At Chattanooga

Mikayla Israel

Name of plaintiff (s)

v.

Ram Partners LLC

Jennifer McCoy

Name of defendant (s)

Case No. 1:24-CV-77
(to be assigned by Clerk)

COMPLAINT

1. A short and plain statement of the grounds for filing this case in federal court (include federal statutes and/or U.S. Constitutional provisions, if you know them):

Defendants are in violation of 15 U.S.C 1692, et seq.

2. Plaintiff, Mikayla Israel resides at

P.O. BOX 4597, Tennessee
street address city

Hamilton, TN, 37405, 678 524 4423.
county state zip code telephone number

(if more than one plaintiff, provide the same information for each plaintiff below)

3. Defendant, Ram Partners LLC lives at, or its business is located at
1100 circle 75 parkway se suite 1200, Atlanta,
street address city
Georgia, 30339.
county state zip code

(if more than one defendant, provide the same information for each defendant below)

Jennifer McCoy
po Box 140450 Nashville tn 37214

4. Short and plain statement of your claim (state as briefly as possible the facts of your case and how each defendant is involved. You may use additional paper if necessary):

The defendants conduct violated 15 U.S.C 1692e(2)
in that defendants misrepresented the legal status of
the debt, including insisting that plaintiff was legally
obligated to pay a debt he did not incur. The defendants'
conduct violated 15 U.S.C 1692e(10) in that defendants
employed false and deceptive means to collect a debt.
They also violated 15 U.S.C 1692e(5) in that Defendants
did take legal action. I asked for a Validation of
Debt according to 15 USC 1692g and was
retaliated against.

5. A demand for judgment for the relief you seek (list what you want the Court to do):

- a. Actual damages pursuant to 15 U.S.C 1692K(a)(1)


- b. Statutory damages of \$1,000 pursuant to 15 U.S.C
1692K (a)(2)(A)

- c. punitive damages

- d. _____

I (We) hereby certify under penalty of perjury that the above complaint is true to the best of my (our) information, knowledge and belief.

Signed this 31st day of January, 2024.



Signature of plaintiff (s)